GARMAN TURNER GORDON LLP 1 GREGORY E. GARMAN, ESO. 2 Nevada Bar No. 6654 E-mail: ggarman@gtg.legal 3 TALITHA GRAY KOZLOWSKI, ESQ. Nevada Bar No. 9040 4 E-mail: tgray@gtg.legal TERESA M. PILATOWICZ, ESO. 5 Nevada Bar No. 9605 6 E-mail: tpilatowicz@gtg.legal 650 White Drive, Suite 100 7 Las Vegas, Nevada 89119 Telephone (725) 777-3000 8 Facsimile (725) 777-3112 9 [Proposed] Attorneys for Debtors 10 UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA 11 In re: Case No.: 15-13706-abl 12 Chapter 11 TURNBERRY/MGM GRAND TOWERS, LLC, 13 Affects this Debtor. JOINTLY ADMINISTERED UNDER 14 CASE NO.: 15-13706-abl In re: 15 TURNBERRY/MGM GRAND TOWER B, LLC, Case No.: 15-13708-abl 16 Chapter 11 Affects this Debtor. 17 In re: Case No.: 15-13709-abl 18 Chapter 11 TURNBERRY/MGM GRAND TOWER C, LLC. 19 Affects this Debtor. Date: August 3, 2015 20 Time: 1:30 p.m. 21 NOTICE OF HEARING ON: (1) APPLICATION FOR ORDER APPROVING 22 EMPLOYMENT OF GARMAN TURNER GORDON LLP AS ATTORNEYS FOR THE DEBTORS NUNC PRO TUNC TO THE PETITION DATE; AND (2) APPLICATION 23 FOR ORDER APPROVING: (I) THE EMPLOYMENT OF ANDARE CORP AS MANAGER OF THE DEBTORS PURSUANT TO 11 U.S.C. § 363 NUNC PRO TUNC 24 TO THE PETITION DATE; AND (II) DR. KENNETH W. WILES AS THE DEBTORS' DESIGNATED RESPONSIBLE PERSON 25 26 **NOTICE IS HEREBY GIVEN** that an Application for Order Approving Employment of 27 Garman Turner Gordon LLP as Attorneys for the Debtors Nunc Pro Tunc to the Petition Date 28

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and an Application for Order Approving: (I) the Employment of Andare Corp as Manager of the Debtors Pursuant to 11 U.S.C. § 363 Nunc Pro Tunc to the Petition Date; and (II) Dr. Kenneth W. Wiles as the Debtors' Designated Responsible Person (together, the "Applications") were filed on July 1, 2015 and July 7, 2015 by Turnberry/MGM Grand Towers, LLC, a Nevada limited liability company, Turnberry/MGM Grand Tower B, LLC, a Nevada limited liability company; and Turnberry/MGM Grand Tower C, LLC (collectively, the "Debtors"). The Applications seeks entry of separate orders: (i) authorizing Debtors to retain the law firm of Garman Turner Gordon LLP as their attorneys in the above-captioned Chapter 11 Cases nunc pro tunc to the Petition Date; and (ii) authorizing Debtors to employ and retain Andare Corp as Debtors' manager and to designate Dr. Kenneth W. Wiles as Debtors' designated responsible person in the Chapter 11 Cases. Any opposition to the Applications must be filed pursuant to Local Rule 9014(d)(1).

NOTICE IS FURTHER GIVEN that if you do not want the court to grant the relief sought in the Applications. or if you want the court to consider your views on the Motion, then you must file an opposition with the court, and serve a copy on the person making the Motion *no later than 14 days* preceding the hearing date for the motion, unless an exception applies (see Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

If you object to the relief requested, you *must* file a **WRITTEN** response to this Pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

• The court may refuse to allow you to speak at the scheduled hearing; and

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The court may *rule against you* without formally calling the matter at the hearing.

NOTICE IS FURTHER GIVEN that the hearing on said Applications will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South, Bankruptcy Courtroom No.1, Las Vegas, Nevada 89101, on August 3, 2015, at the hour of 1:30 p.m.

DATED this 7th day of July, 2015.

GARMAN TURNER GORDON

By: /s/Talitha Gray Kozlowski
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